

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1  
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#### IV. Discussion

##### A. Number of license Classes

11. I believe 3 classes of operator licenses are all that is needed. They will be similar to the Technician, General and Extra classes. Since I propose a single 5 wpm send and receive morse code requirement, the Novice and Technician Plus classes make no sense and can be allowed to Grandfather to the General class. The Advanced class was defined to allow advancement without additional code proficiency. Since code will play a much smaller role in the future, having the Advanced class is redundant. While I was studying for the Novice class a teacher told me the old FCC rules had just 2 classes, A and B. I think it will be smart to call these classes A, B, and C.

12. With 3 classes the band plan gets much simpler. I think the A class should continue to have the lowest 25 kHz for Morse Only on all bands from 160 meters through 70 Cm. This is for weak signal and DX work. Class B will have 25 kHz for Morse Only on all the same bands with the A class. The 25 kHz will be adjacent to the A class band. Next comes a digital band of 50 kHz where packet and Amtor and other digital communications can be used. This band will be available to class A and B on frequencies from 160 through 10 meters, and all classes from 6 meters up. There can be expanded digital bands above 10 meters as required. Class A will have a voice band of 25 kHz just above the digital band to themselves. Class B will have a voice band from the class A voice band to the end of the frequency allocation. All classes will be allowed a maximum power consistent with current Extra class maximum powers, regardless of class. Any person with class C should be able to build a moon bounce station.

##### B. Greater Volunteer Examiner Opportunities

14. With 3 classes a person holding an A class can be a VE for all classes, the B can do B and C and the C can do only C. Code testing can be done by class A and B VE's. The principle that a VE can administer only elements they themselves have passed is very good. I have been getting current General class VE trained since they are younger and work better with the young people coming in for a Technician class test.

##### C. RACES Station License

15. This class should be allowed to die with the current holders being told they may not renew the license. This class provides nothing to the current Emergency Communications work in this area.

##### D. Privatization of certain Enforcement Procedures

18. I have been an Amateur Radio Operator for almost 50 years and have never met a member of the Amateur Auxiliary. They must be in short supply. I have received "pink slips" from the FCC and post cards from the ARRL Official Observers. I'm an active operator and do make errors. Since there are no longer FCC Field Offices across the country there has been little enforcement of the Amateur Service Rules. There needs to be a system set up that lets local Amateur

Service people be trained to detect and properly report the infraction to the FCC and the person guilty of it. This works because a threat of loosing my license is a real threat. I will change my way of operating or stop doing something if it means saving my license. The trained Amateur Service policeman is a volunteer and needs to be trained to gather the proper evidence that can be used by FCC to revoke the offenders license if needed. Breaking FCC rules means that FCC must be in the loop. We can always sue another person for some hurt. But you can't claim the person broke an FCC Rule in court. I think the Amateur Auxiliary needs to be looked at for a volunteer police force. As with the VE system it needs to require 3 people to agree a person has broken Rules and a form needs to be designed to make the report. In fact it will require 2 or more forms and proof that the person who has broken the rules has received the paperwork accusing him of doing so. Also any papers from the person must be forwarded to FCC. It should be possible to use current VE people as Amateur Auxiliary trained people as well. Now we VE's handle money and paperwork for FCC. The VEC has an electronic circuit with FCC now for testing results so it can be expanded to handle Amateur Auxiliary paper work as well. If the VEC refuse to take this added work most Amateur Service people have Internet providers so the the feedback to FCC can be an e-mail like this one. But include a US Mail method too.

23,24,25. I believe it is time to end the requirement for demonstrating code proficiency for obtaining an Amateur Service operating license. We need to reserve spectrum for people that desire to use the Morse Code for weak signal work and DX. In 1998 it is not important to copy code. It is not something we need to keep in the examinations for entry to the Amateur Service.

#### F. Written Examinations

26. As stated the VEC is now making the 500 question pools for each of the classes. The exams are multiple choice and detractors are sometimes used. This is a technique borrowed from Colleges and it works fine. The reason it works is that 500 questions and answers can not be remembered. Since the exam is closed book, the student needs to study the subjects and be able to memorize a few facts and derive many more from basic math or deduction.

27. I would like to replace (6) Amateur station equipment circuit components with (6) Types of Amateur radio equipment. Under this heading put questions about the type of equipment they should buy if they want to work with satellites or Emergency Communication or the many other parts of the Amateur Service. The rational for this change is due to the most usual purchase of radio equipment rather than building it. Not many people are going to build or even modify their own equipment.

Best wishes

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